

GENERAL CLIENT INFORMATION

Client information on the handling of conflicts of interest

Principles applied to the execution of investment decisions

Privacy statement

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CLIENT INFORMATION ON THE SECURITIES PROVIDER AND ITS SECURITIES SERVICES (SECTION 5 (2) OF THE GERMAN REGULATION ON THE CONDUCT AND ORGANISATION OF SECURITIES PROVIDERS – WERTPAPIERDIENSTLEISTUNGS-VERHALTENS- UND ORGANISATIONSVERORDNUNG (WPDVEROV))

General client information pursuant to Article 47 of the Commission Delegated Regulation (EU) 2017/565 (mandatory pursuant to Section 63 (7) of the German Securities Trading Act – Wertpapierhandelsgesetz (WpHG))

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1 | FINANCIAL PORTFOLIO MANAGEMENT

BPM – Berlin Portfolio Management GmbH (hereinafter “BPM”) carries out financial portfolio management activities for its clients. Financial portfolio management, also known as asset management, is the management of client assets invested in financial instruments with scope for discretionary decisions on the part of the asset manager in the context of a mandate issued to him*.

Within the framework of the investment guidelines agreed with the client, the former grants the asset manager the authority to make investment decisions at his discretion if he considers them to be appropriate for the contractually agreed management of the client’s assets. Accordingly, within this framework the asset manager may dispose of the relevant assets, e.g. by buying and selling securities through or outside the exchange in the form of fixed-price or commission-based trades, without previously needing to obtain an instruction from the client. For further information on the execution of investment decisions, please refer to Section 14 (Principles which apply to the execution of investment decisions).

BPM ensures the suitability for the client of the asset management and the selected investment strategy. Accordingly, prior to the conclusion of an asset management agreement, BPM questions the future client concerning his knowledge and experience of investment transactions, his financial circumstances, his investment goals and his expectations and wishes in respect of sustainability aspects. This information is intended to facilitate the making of investment decisions which are appropriate for the client.

An individual securities account and a clearing account are set up for the client with a custodian bank (custodian). This account is used for the safe custody of those of the client’s assets which come within the remit of the asset management and for the posting of the transactions made in the context of the asset management. The client is the sole owner of the securities account and the clearing account and may approve transfers and withdrawals from this account. The client grants to BPM the discretionary authority to dispose of assets, by which BPM is authorised to make transactions in the clearing and securities accounts in the name and on the account of the client, while observing the investment guidelines laid down in the asset management agreement. With the exception of its asset management fee, BPM is not entitled to generate property or assets for itself from the client’s assets or to transfer the same to other accounts or securities accounts.

When it comes to investment decisions, the asset manager is bound by the previously agreed investment guidelines set out in the asset management agreement. BPM acts in the best interests of the client at all times. However, under particular circumstances it is not possible to completely avoid conflicts of interest. To find out how BPM handles conflicts of interest, please see section 10 (Handling conflicts of interest).

Asset management typically focuses on long-term asset preservation and accumulation. The client should therefore have a long-term investment horizon, as this will increase the probability of the portfolio’s recovery from occasional periods of negative growth. It is advisable to use only those assets for asset management purposes which are not required to cover short- and medium-term lifestyle costs or other liabilities.

Asset management is associated with risks to the client’s asset situation. Although the asset manager is obliged always to act in the client’s best interests, bad decisions or even improper conduct on the part of the asset manager cannot be ruled out. BPM can offer no guarantee for the success of any investment or the avoidance of losses. Even when the selected investment strategy is followed, the client may still incur losses, e.g. due to changes in the market.

*For ease of readability, only masculine pronouns are used in the text. This is not to be taken as an expression of intentional discrimination or unequal treatment.

2 | INVESTMENT PHILOSOPHY

BPM's investment philosophy includes the provision of an individual investment portfolio which, assuming the basic portfolio is stable, features additional subject- or strategy-specific elements. Each personal portfolio can be assigned to one of three principal strategies: "defensive", "balanced" or "dynamic". Based on the information provided by the client on his investment experience and goals and on other factors relevant to decision-making, BPM will propose to the client a suitable principal strategy with the aid of an analytical programme which has been developed in house.

The investment decisions within the basic portfolio are based on an ongoing macroeconomic analysis which takes into account macroeconomic aspects such as the level of debt, economic growth, interest rates, inflation and exchange rates, along with an analysis of the financial markets which considers such factors as price-earnings ratios, price-cashflow ratios, dividend yields and payout ratios on the world's key financial markets. Individual investment decisions are based on the principles of broad diversification, cost efficiency and the reduction of currency, issuer, sustainability and other risks.

The investment decisions for additional elements are primarily based on significant societal, technological or economic trends and on special situations. These elements also serve the purpose of fine-tuning investor interests in respect of individual readiness to take risks and earnings expectations. To identify promising trends, numerous information sources are used as part of secondary research. For individual investment decisions, the principles of broad diversification and cost reduction are applied and additional assessment criteria (e.g. price-earning ratio or price-cashflow ratio) and risk indicators (e.g. volatility, market capitalisation, ratings, etc.) used.

3 | NAME AND ADDRESS OF THE SECURITIES SERVICE PROVIDER

BPM – Berlin Portfolio Management GmbH offers comprehensive information about its services on its website www.berlin-pm.com. You are welcome to send enquiries to info@berlin-pm.com; we will also gladly respond to any questions you may have in a personal interview. BFM staff are also available to answer your questions by telephone from 9 am to 6 pm, Monday to Friday, except on public holidays.

BPM – Berlin Portfolio Management GmbH
Uhlandstrasse 33
10719 Berlin

Tel.: +49 30 8871087-0
E-Mail: info@berlin-pm.com
www.berlin-pm.com

4 | COMMUNICATION WITH BPM – BERLIN PORTFOLIO MANAGEMENT GMBH

Language of communication

You can communicate with BPM in either German or English. Individual members of staff also speak Russian, Dutch, Hebrew and French. The authoritative languages for contract documents and information are German and English.

Means of communication

BPM generally communicates via personal contact, phone, mail or e-mail to the e-mail address given above. BPM reserves the right to send important information to clients in writing. In the provision of its services, BPM accepts no orders or instructions over the phone, with the exception of bank transfer orders to a reference bank account of the client held at a third-party bank which has previously been nominated for the securities account. It also reserves the right to record individual phone conversations and to store them for the long term if to do so is prescribed by law. Information given over the phone does not under any circumstances fulfil the conditions for the creation of a consultancy relationship.



5 | TYPE, FREQUENCY AND TIME OF REPORTING ON THE SERVICES PROVIDED

At the end of every calendar month, the selected custodian bank sends a list of the transactions carried out by BPM in the name of the client, along with the current asset values. BPM also informs the client's custodian bank without undue delay of any new asset losses which exceed a loss threshold, defined in percent by the client, since the last report was issued. For further information on these reports, please refer to the details in the asset management agreement.

6 | NAME AND ADDRESS OF THE COMPETENT AUTHORITY

BPM is a financial services institution under the supervision of the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), Marie-Curie-Strasse 24–28, 60439 Frankfurt am Main.

The company is registered with the BaFin under institution number 123635.

7 | MEASURES FOR THE PROTECTION OF FINANCIAL INSTRUMENTS OR CLIENT MONIES HELD IN SAFE CUSTODY

BPM has voluntarily taken out asset liability insurance with a reputable insurance company.

BPM is also assigned by law to the Entschädigungseinrichtung der Wertpapierhandelsunternehmen (EdW) protection scheme, 10865 Berlin, www.e-d-w.de.

With regard to the provisions governing the protection and the scope and amount thereof, we refer the reader to our "Information concerning the protection scheme (EdW) pursuant to section 31 of the German Securities Institutions Act (Wertpapierinstitutsgesetz (WpIG))", which we issue to all clients along with the asset management agreement documents when the agreement is concluded.

Clients who avail themselves of the securities services offered by securities service providers such as BPM are protected by law. The Entschädigungseinrichtung der Wertpapierhandelsunternehmen (EdW) is the competent body in this regard. The EdW will provide compensation if a securities trading company is no longer in the position to meet its obligations to its clients from securities trading and the BaFin has established that compensation is due. Since BPM, as a financial portfolio manager, a.) is not authorised to accept client monies or securities and b.) is not entitled to manage clearing accounts and securities accounts and thus does not receive money or keep any financial instruments in its custody, such damage is to all intents and purposes excluded.

For the trading and custodianship of securities, BPM relies on the services of the custodian bank in question which is entitled to operate a deposit and securities business. German custodian banks used by BPM's clients are affiliated to either Einlagensicherungsfonds des Bundesverbandes deutscher Banken e.V. or Entschädigungseinrichtung deutscher Banken GmbH.

8 | INFORMATION ON THE WAY IN WHICH SUSTAINABILITY RISKS ARE INTEGRATED (ART. 6 DISCLOSURES REGULATION)

We are obliged by law to give the following information.

We have no intention to promote ecological or social characteristics in our investment strategies or for other specific financial instruments.

As part of its social responsibility, BPM desires to make a contribution to doing business in a more sustainable, resource-efficient manner, with the particular goal of reducing the risks and impacts of climate change. Besides keeping sustainability goals within our own organisation, we see it as our responsibility to make BPM's customers aware of aspects of sustainability. Therefore, as part of our asset management we ask our customers for their thoughts and wishes concerning sustainability, which we then implement.

Environmental conditions, social unrest and/or poor business management can have negative impacts in many respects on the value of the investments and assets in the portfolios BPM manages. The condition of assets, finance and yield as well as the reputation of individual investments can be directed impacted by these sustainability risks, as they are known. Ultimately, such risks cannot be completely ruled out.

9 | DECLARATION ON THE NON-CONSIDERATION OF ADVERSE IMPACTS ON SUSTAINABILITY FACTORS (ART. 7 DISCLOSURES REGULATION)

Pursuant to Art. 7 (2) in conjunction with Art. 4 (1)(b)/Art. 4 (5)(b) Disclosures Regulation, we are obliged to state the following:

Investment decisions can have adverse impacts on the environment (e.g., the climate, water, biodiversity), on social topics and employees' concerns and also have a detrimental effect on controlling graft and corruption.

BPM takes great interest in taking its responsibility as a financial services provider seriously and to making a contribution to preventing these kinds of impacts when making investment decisions for asset management. However, based on the current circumstances brought about by the existing bureaucratic framework and that which is expected to follow, implementing the statutory provisions to regulate this puts an unreasonable demand on us as an owner-managed mid-sized company. Moreover, fundamental legal questions are still not clear.

So as not to put ourselves at a legal disadvantage, we cannot currently make a public declaration to confirm that we consider the adverse impacts on sustainability factors (environmental concerns, social concerns, etc.) when making decisions about investments or how we go about this. We are therefore obliged to point out on our website that for the time-being we do not consider the adverse impacts on sustainability factors and will not do so until further clarification is forthcoming.

However, we expressly declare that this action does not alter our readiness to make a contribution to doing business in a more sustainable, resource-efficient manner, with the particular goal of reducing the risks and impacts of climate change and other ecological and social problems.



10 | PRINCIPLES WHICH APPLY TO THE HANDLING OF CONFLICTS OF INTEREST

With its business model, which dispenses with commission payments from third parties (especially product providers), reimbursements from securities orders and front-end loads, BPM largely avoids conflicts of interest. BPM merely receives the arranged management fees from the client, especially in the context of financial portfolio management. Fees received for consultancy and management services for public and special funds, which can be used in management mandates for clients, are not covered by this regulation.

However, conflicts of interest cannot be completely excluded. In accordance with the stipulations of the relevant statutory provisions, we are therefore informing you here of the general measures we take to manage conflicts of interest.

Conflicts of interest can in principle arise between clients and BPM, its management, staff and affiliated individuals, and with other clients of BPM.

To avoid a situation in which extraneous interests influence the execution of orders or the asset management, BPM has placed all its staff under the obligation to observe high ethical standards. We expect due care and probity, lawfulness and professionalism, ongoing professional training, adherence to market standards and, in particular, the upholding of client interests as a priority. Moreover, as a member of the Verband der Unabhängigen Vermögensverwalter Deutschland e.V., (German Association of Independent Asset Managers (VuV)), BPM has undertaken to observe the association's Code of Conduct.

To avoid possible conflicts of interest from the start, BPM has adopted the following measures (among others):

- In the company, a Compliance officer is responsible for the identification, avoidance and management of conflicts of interest;
- The creation of organisational procedures to uphold client interests in asset management;
- Regulations concerning the acceptance and giving of gratuities and the disclosure thereof;
- A remuneration system for staff that is compliant with the statutory requirements and creates no incentive on the part of staff members to take disproportionately high risks or to act against the interests of the clients;
- The demarcation of divisions from one another and simultaneous management of the flow of information between them (creation of confidentiality areas);
- Identification of all members of staff for whom conflicts of interest might arise in the context of their work;
- Disclosure of securities trades of all members of staff to the competent body;
- Regulation concerning proprietary trading by the bodies and employees of BPM;
- Regulation concerning the acceptance of gifts and other perks by members of staff;
- Execution of orders in accordance with the best execution policy;
- Staff training.

11 | INFORMATION ON THE RECEIPT OF GRATUITIES

When they sell securities, securities service providers often receive gratuities (portfolio commissions or reimbursements) related to custody fees, stock exchange and trustee commissions, brokerage fees and other fees from banks, investment companies and securities issuers.

They may also receive acquisition commissions such as placement commissions and/or front-end loads and redemption commissions. BPM – Berlin Portfolio Management GmbH dispenses completely with such gratuities. Any such gratuities are disbursed directly to the client.

On occasion and where to do so is permitted by law, BPM will receive services free of charge from providers in connection with securities trading, such as financial analyses or other information material, training and, in part, technical services and equipment required for access to third-party information and dissemination systems. The receipt of such gratuities is not directly associated with the services provided to the client. Rather, these gratuities are used, especially in the context of capital market analyses, with the aim of providing the client with services of the expected high quality and continuously improving them.

- A conflict of interest that is typical of asset management can arise with the agreement of performance-related pay. In this case the possibility cannot be excluded that the asset manager will take disproportionately high risks in pursuit of the highest possible performance and, with it, higher remuneration.
- His work as an asset manager and asset consultant for institutional clients, especially investment companies, capital management companies and other participants in the capital market can result in the receipt by BPM of contractually arranged remuneration. The amount of such remuneration is disclosed to the affected clients on request.

Details of these principles will be shared with you at any time on request.

12 | CLIENT CLASSIFICATION AND INVESTOR PROTECTION

In principle, we classify all our clients as private investors (small investors) pursuant to Art. 24 (4) of EU Regulation 2014/65/EU. This affords you the full investor protection granted by the Securities Trading Act and the various European regulations, especially Commission Delegated Regulation (EU) 2017/565.

As a client, you have the right to request different classification (e.g. as a professional client) if the existing statutory requirements pursuant to section 67 (6) WpHG are met. This will, however, restrict the level of client protection you would otherwise enjoy.

Whether the conditions for reclassification are met will be verified by us in a separate procedure as soon as you submit the relevant application to us. You will then be instructed in writing if your reclassification has been successful.

13 | COMPLAINTS

Submitting your concern

You can share any complaints with us by mail, phone or e-mail using the contact information above.

Please state your name and contact details and a description of your concern.

Periods for the processing of your concern

You will receive confirmation **without undue delay** by mail or e-mail that we have received your complaint. We will then make every effort to sort out your concern as quickly as possible in your interest. If this should not be possible within **two weeks** of receipt, you will receive a provisional reply from us by mail or e-mail.

Within **four weeks** of receipt, you will receive a conclusive reply from us by mail or e-mail. If this should not be possible, we will give you the reasons along with our estimate of when we anticipate that the concern will be sorted out.

Should it not be possible to find a remedy for your concern, you can contact the VuV's arbitration body.

Arbitration body of the VuV

We are a member of the Verband unabhängiger Vermögensverwalter Deutschland e.V. (VuV) and are obliged according to its constitution to take part in arbitration proceedings run by the office of the VuV's ombudsperson. The VuV's arbitration body is therefore competent to arbitrate in pecuniary disputes arising from financial service agreements:

Office of the VuV's ombudsperson
Stresemannallee 30
60596 Frankfurt am Main
<http://vuv-ombudsstelle.de/>

14 | PRINCIPLES WHICH APPLY TO THE EXECUTION OF INVESTMENT DECISIONS

1. Scope

The following principles apply to the execution of investment decisions made by BPM in accordance with the asset management agreement and within the framework of the investment guidelines laid down therein for the purchase or sale of securities or other financial instruments (disposals).

2. Priority of instructions

The client can issue instructions to BPM setting out the execution venues for individual investment decisions to be made by the institution. Such instructions will in all cases take priority over the present execution principles.

Please note: If such an instruction is issued by the client, the institution will not execute its investment decision in accordance with the present principles.

3. Principles of order execution

BPM takes into account all relevant criteria for achieving the best possible result, in particular the prices of the financial instruments, the costs associated with the execution of the order, the speed, probability of execution and settlement of the order, and the scope and nature of the order. The best possible result is based on the total consideration, i.e. the price for the financial instrument and all costs associated with the execution of the order.

4. Execution of the investment decision by the custodian bank

BPM does not execute previously taken investment decisions itself but commissions the client's custodian bank with the execution thereof. The custodian bank's best execution policy applies mutatis mutandis.

BPM reviews the best execution policy of the client's custodian bank based on the order settlements, but at least once a year, for adherence by the custodian bank to the obligations laid down therein.

15 | VALUING FINANCIAL INSTRUMENTS

When valuing the financial instruments held in the client portfolio, BPM takes over the valuation of the client's custodian.

Investment funds are in principle valued at the share value published by the investment company in question. Listed securities (including index funds, ETFs), on the other hand, are valued at the closing rate in question. If no stock exchange price is provided for a financial instrument, the fair value is determined by the custodian using general valuation standards, or the last available stock exchange price is used.

The valuations of the financial instruments in the client's portfolio are performed at the latest on the respective reporting dates.

BPM may aggregate securities orders and pass them on for execution as a collective order. If this collective order is executed at different rates, BPM will perform the allocation to the individual client securities accounts at average values. This eliminates any possibility of favouritism towards individual clients.

16 | COSTS

The amount of remuneration for asset management is agreed with the client in the asset management agreement. This differs depending on the amount of assets under management as well as the complexity of the desired management task. Payment is made on a quarterly basis by debiting the pro rata asset management fee from the client's relevant securities account by direct debit. The client has the right to object to this. At the beginning and end of a mandate, a pro rata calculation of the management fee takes place.

Costs of the custodian bank, such as flat-rate service fees (all-in fees), custody account management fees, transaction costs and stock exchange settlement fees in connection with securities transactions, as well as any taxes on securities income or stock exchange settlement fees, are not part of BPM's asset management fee. These are separately invoiced by the custodian bank and taken from the client's account.

To ensure the highest possible transparency of the costs of asset management by BPM, a comprehensive and individual total cost disclosure and ex-ante cost estimate pursuant to Art. 24 (4) MiFID II is prepared and brought to the attention of the client prior to the commencement of the contract.

17 | LICENCE FOR THE PROVISION OF SECURITIES SERVICES

BPM – Berlin Portfolio Management GmbH possesses the licence required to provide the following financial services, for which a licence is mandatory:

- Investment brokerage (section 2 (2)(3) WpIG)
- Investment consultancy (section 2 (2)(4) WpIG)
- Acquisition brokerage (section 2 (2)(5) WpIG)
- Financial portfolio management (section 2 (2)(9) WpIG)

18 | CONTACT

BPM – Berlin Portfolio Management GmbH
Uhlandstrasse 33
10719 Berlin

Tel.: +49 30 8871087-0
E-mail: info@berlin-pm.com
www.berlin-pm.com

DATA PROTECTION POLICY OF BPM – BERLIN PORTFOLIO MANAGEMENT GMBH LEGAL INFORMATION

We are glad that you show interest in our company. Data protection is of particular importance for the management of BPM – Berlin Portfolio Management GmbH.

The processing of personal data, such as the name, address, e-mail address or telephone number of a person, is always in accordance with the General Data Protection Regulation and in accordance with the country-specific data protection provisions applicable to BPM – Berlin Portfolio Management GmbH. By means of this legal instruction, our company would like to inform you about your rights.

BPM – Berlin Portfolio Management GmbH, as the responsible party, has implemented numerous technical and organizational measures in order to ensure the most complete possible protection of the processed personal data.

1. Name and address of the responsible party

The party responsible within the meaning of the General Data Protection Regulation, other data protection laws in the Member States of the European Union and other provisions of a data protection character is:

BPM – Berlin Portfolio Management GmbH
Uhlandstrasse 33
10719 Berlin, Germany
Tel.: +49 30 8871087-0
E-mail: info@berlin-pm.com
Website: www.berlin-pm.com

An external company data protection officer pursuant to Article 37 of the EU General Data Protection Regulation (GDPR) has been appointed:

Dipl.-Inform. Thomas Ziemer
datenschutz-maximum
Postfach 470805
12316 Berlin
E-mail: dsb-bpm@datenschutz-maximum.de
Appointment as data protection officer from 24.05.2018.

2. Rights of the client

2.1 Right to confirmation

Each affected person has the right, as granted by the European legislator and regulator, to require the responsible party to confirm whether personal data relating to him / her is being processed. If an affected person wishes to make use of this confirmation right, they can contact our data protection officer or another employee of the responsible party at any time.

2.2 Right to information

Any person affected by the processing of personal data shall have the right granted by the European legislator and regulator to obtain at any time, free of charge, from the responsible party any personal data stored about him or her and a copy of that information. Furthermore, the European legislator and regulator has granted the affected person disclosure of the following:

- the processing purposes
- the categories of personal data being processed
- the recipients or categories of recipients to whom the personal data have been disclosed or are still being disclosed, in particular to recipients in third countries or to international organizations
- if possible, the planned duration for which the personal data will be stored, or, if this is not possible, the criteria for determining that duration, the right to rectification or erasure of the personal data or restriction of the processing by the responsible party
- the existence of a right to complain to a supervisory authority if the personal data are not collected from the affected person: all available information on the origin of the data the existence of automated decision-making including profiling in accordance with Article 22 paragraphs 1 and 4 GDPR and - at least in these cases - provide meaningful information about the logic involved and the scope and intended impact of such processing on the affected person

In addition, the affected person has a right of access as to whether personal data has been transmitted to a third country or to an international organization. In this case, the af-



affected person has the right to obtain information about the appropriate guarantees in connection with the transfer.

If an interested party wishes to exercise this right to information, they may at any time contact an employee of the responsible party. (Article 15 (1) GDPR / DSGVO)

2.3 Right to rectification

Any person affected by the processing of personal data has the right granted by the European legislator to demand the immediate correction of incorrect personal data concerning him / her. Taking the purpose of the processing into account, the affected person has the right to request the completion of incomplete personal data, also by means of a supplementary declaration.

If an affected person wishes to exercise this right of rectification, they may, at any time, contact an employee of the responsible party. (Article 16 GDPR / DSGVO)

2.4 Right to cancellation (right to be forgotten)

Any person affected by the processing of personal data shall have the right granted by the European legislators and regulators to require the responsible party to immediately delete the personal data concerning him / her, provided that one of the following reasons is satisfied and the processing is not required:

- The personal data has been collected for such purposes or otherwise processed for which they are no longer necessary.
- The affected person revokes their consent, on which the processing was based in accordance with Article 6 (1) (a) of the GDPR or Article 9 (2) (a) GDPR / DSGVO, and there is no other legal basis for the processing.
- The affected person submits an objection to the processing pursuant to Art. 21 (1) GDPR / DSGVO, and there are no legitimate reasons for the processing, or the data subject submits an objection to the processing in accordance with Art. 21 (2) GDPR / DSGVO.
- The personal data were processed illegitimate.
- The deletion of personal data is required to fulfill a legal obligation under European law or the law of the Member States to which the responsible party is subject.
- The personal data were collected in the context of offered services by the information society pursuant to Art. 8 para. 1 GDPR / DSGVO.

If one of the above reasons is correct and an affected person wishes to arrange for the deletion of personal data stored by

BPM – Berlin Portfolio Management GmbH, they may at any time contact our data protection officer or another employee of the responsible party.

The data protection officer of BPM – Berlin Portfolio Management GmbH or another employee will arrange that the request for deletion be fulfilled immediately.

If the personal data have been made public by BPM – Berlin Portfolio Management GmbH and if our company is responsible for deleting personal data as the person responsible pursuant to Art. 17 para. 1 GDPR / DSGVO, BPM – Berlin Portfolio Management GmbH shall apply technology and implementation costs in appropriate measures, including technical means, to inform other data controllers processing the published personal data that the data subject has deleted all links to such personal data from those other data controllers or has requested copies or replicas of such personal data, unless the processing is required. The data protection officer of BPM – Berlin Portfolio Management GmbH or another employee will arrange the necessary in individual cases.

2.5 Right to restriction of processing

Any person affected by the processing of personal data has the right, granted by the European directive and regulatory authority, to require the controller to restrict the processing if one of the following conditions applies:

The accuracy of the personal data is contested by the affected person for a period of time that enables the responsible party to verify the accuracy of the personal data. The processing is unlawful, the affected person refuses to delete the personal data and instead requests the restriction of the use of personal data. The responsible party no longer needs the personal data for the purposes of processing, but the affected person requires them to assert, exercise or defend legal claims. The affected person has objection to the processing acc. Art. 21 para. 1 GDPR / DSGVO and it is not yet clear whether the legitimate reasons of the responsible party outweigh those of the affected person.

If one of the above-mentioned requirements is met and an affected person wishes to request the restriction of personal data stored by BPM – Berlin Portfolio Management GmbH, it may at any time contact our data protection officer or another employee of the responsible party. The data protection officer of BPM – Berlin Portfolio Management GmbH or another employee will initiate the restriction of processing.



2.6 Notification obligation in connection with the correction or deletion of personal data or the restriction of processing

Any affected person shall have the right granted by the European legislator and regulator to be informed by the responsible party of the recipients to whom the personal data of the affected person have been disclosed, if he / she so requests.

The responsible party shall inform all recipients who have been disclosed personal data of the affected person of any correction or deletion of personal data or a restriction of processing under Article 16, Article 17 paragraph 1 and Article 18 GDPR / DSGVO, unless this proves to be impossible or is associated with a disproportionate effort.

2.7 Right to data portability

Any person affected by the processing of personal data shall have the right conferred by the European legislator and regulator to obtain the personal data concerning him / her provided to a responsible party by the affected person in a structured, common and machine-readable format. It also has the right to transfer this data to another person responsible without hindrance by the responsible party to whom the personal data was provided, provided that the processing is based on the consent pursuant to Art. 6 (1) (a) GDPR / DSGVO or Art. 9 Abs 2 (a) of the GDPR / DSGVO or on a contract pursuant to Article 6 (1) (b) of the GDPR / DSGVO and processing by means of automated processes, unless the processing is necessary for the performance of a task of public interest or in the exercise of public authority, which has been assigned to the responsible party.

Furthermore, in exercising their right to data portability under Article 20 (1) of the GDPR / DSGVO, the affected person has the right to obtain that the personal data are transmitted directly from one responsible party to another, insofar as this is technically feasible and if so this does not affect the rights and liberties of others.

In order to assert the right to data portability, the affected person may at any time contact the data protection officer appointed by BPM – Berlin Portfolio Management GmbH or another employee.

2.8 Right to object

Any person affected by the processing of personal data shall have the right, conferred by the European legislator and re-

gulator, for reasons arising from its particular situation, to object to the processing of personal data relating to Article 6 (1) (e) or (f) GDPR / DSGVO. This also applies to profiling based on these provisions.

BPM – Berlin Portfolio Management GmbH will no longer process your personal data in the event of an objection, unless we can prove that there are compelling reasons for processing which exceed the interests, rights and freedoms of the affected person, or the processing serves the purpose of assertion, exercise or defense of legal claims.

If BPM – Berlin Portfolio Management GmbH processes personal data in order to operate direct advertisement, the affected person has the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to the profiling, as far as it is associated with such direct advertisement. If the affected person objects to BPM – Berlin Portfolio Management GmbH for the purposes of direct advertisement, BPM – Berlin Portfolio Management GmbH will no longer process the personal data for these purposes.

In addition, the affected person has the right to object to the processing of personal data for reasons arising from his / her particular situation, for scientific or historical research purposes or for statistical purposes pursuant to Art. 89 (1) GDPR / DSGVO. Objections shall be lodged unless such processing is necessary to fulfill a task of public interest.

In order to exercise the right to object, the affected person can directly contact the data protection officer of BPM – Berlin Portfolio Management GmbH or another employee. The affected person is also free, in the context of the use of information society services, notwithstanding Directive 2002/58 / EC, to exercise its right of opposition through automated procedures using technical specifications (Article 21 GDPR / DSGVO).

2.9 Automated decisions in individual cases including profiling

Any person affected by the processing of personal data shall have the right, as granted by the European legislator and regulator, not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on it or, in a similar manner, significantly affects it; unless the decision is necessary for the conclusion or performance of a contract between the data subject and the responsible party, or is permitted by European Union or Member State legislation to which the controller is subject, and that legislation is adequate to safeguard rights and liberties and

the legitimate interests of the affected person or with the express consent of the affected person.

If the decision to conclude or fulfill a contract between the data subject and the person responsible is necessary or if it is made with the express consent of the data subject, BPM – Berlin Portfolio Management GmbH shall take appropriate measures to safeguard the rights and freedoms as well as the legitimate interests of the affected person, including at least the right to obtain the intervention of a person by the responsible party, to express his / her own position and to contest the decision.

If the affected person wishes to assert any rights with respect to automated decisions, they may at any time contact

our data protection officer or another employee of the responsible party (Article 21 GDPR / DSGVO).

2.10 Right to revoke a data protection consent

Any person affected by the processing of personal data has the right, granted by the European legislator and regulator, to revoke consent to the processing of personal data at any time.

If the affected person wishes to assert their right of withdrawal of consent, they may at any time contact our data protection officer or another employee of the responsible party (Article 7 (3) GDPR / DSGVO).

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